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8	Attorneys for Plaintiff ELECTRONIC FRONTIER FOUNDATION	
9		DICTRICT COURT
0	UNITED STATES DISTRICT COURT	
1	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
12	SAN FRANCISCO DIVISION	
13	ELECTRONIC FRONTIER FOUNDATION,	) )
14	Plaintiff,	COMPLAINT FOR INJUNCTIVE RELIEF FOR VIOLATION OF THE
15	V.	FREEDOM OF INFORMATION ACT,
16	UNITED STATES DEPARTMENT	
17	OF HOMELAND SECURITY,	) )
18	Defendant.	) )
19	1. This is an action under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, for	
20	injunctive and other appropriate relief. Plaintiff seeks the expedited processing and release of records	
21	that Plaintiff requested from Defendant Department of Homeland Security, and its components	
22	Immigration and Customs Enforcement and Customs and Border Protection, concerning the	
23	agency's use of Rapid DNA testing on migrant families entering the United States.	
24	<u>PARTIES</u>	
25	2. Plaintiff Electronic Frontier Foundation ("EFF") is a not-for-profit corporation	
26	established under the laws of the Commonwealth of Massachusetts, with offices in San Francisco	
27	California and Washington, D.C. EFF is a donor-supported membership organization that works to	
28	inform policymakers and the general public about civil liberties issues related to technology and to	
	d .	